

UNITED STATES DISTRICT COURT

Southern District of Texas

Holding Session in Houston

UNITED STATES OF AMERICA

V.

GODWIN CHIEDO NZEOCHA

CASE NUMBER: 4:09CR00426-002

USM NUMBER: 15923-379

**GODWIN CHIEDO NZEOCHA'S MOTION TO ALLOW TRAVEL
OUTSIDE THE UNITED STATES**

Godwin Chiedo Nzeocha, by and through his Counsel, Babatunde Coker, requests permission to travel outside the United States in order to attend the funeral rites of his recently deceased Mother based on the following considerations:

1. Mr Nzeocha was sentenced for conspiracy to commit health care fraud on May 10, 2013, for a term of 109 months.
2. Mr. Nzeocha has served a term of 80 months and is currently on probation which period ends on June 13, 2022.
3. On September 18, 2021, Mr. Nzeocha's mother passed away in Nigeria. (See attached EX: A Death Certificate).
4. Prior to her death, Mr. Nzeocha has not seen his mother for over 114 months.
5. Mr. Nzeocha pleads to this Court to grant him the opportunity to pay his last respects to his Late Mother who will be buried on January 7th, 2022 in Amakohia, Uratta, Owerri, Imo State, Nigeria. (See Attached – EX B: Obituary and Program of Burial).

6. Mr. Nzeocha has served out most of his term and is now a remodeled citizen of the United States. He lives with his wife and children in Houston.
7. Mr Nzeocha has made necessary arrangements for the trip if this Motion is granted. (See Exhibit C- Itinerary for Godwin Nzeocha)

Respectfully Submitted,
Lawal & Coker, P.C.

s/ Babatunde Coker
Babatunde O. Coker
Fed Ct # 566684
SBN: 24010825
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Houston,
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V.

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CASE NUMBER: 4:09CR00426-002

USM NUMBER: 15923-379

CERTIFICATION OF SERVICE

I HEREBY CERTIFY THAT ON 9th November, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, and I sent a copy to the following:

Acting U.S. Attorney-Jennifer Lowery via Fax to 713-718-3300

Probation officer- Cynthia Moreno via email to
Cynthia_moreno@txsp.uscourts.gov

s/ Babatunde Coker

Attorney for Godwin Chiedo Nzeocha



Form D.2

CAUTION: Any person who (1) Falsifies any of the particulars on this certificate or (2) uses a falsified certificate as true, knowing it to be false is liable to prosecution.

EX. 'A'

ORIGINAL

FEDERAL REPUBLIC OF NIGERIA
NATIONAL POPULATION COMMISSION
CERTIFICATE OF DEATH No. D 082924

Issued under the Births and Death Etc. (Compulsory Registration) Decree 69 of 1992.

Registration Centre FED SEC CENTRETown/Village NEW OWERRIL.G.A. OWERRI MUNICIPALState IMO

<u>1</u>	<u>2021</u>	<u>905</u>
Volume	Year	Entry No.

This is to certify that the death, details of which are recorded herein, has been registered on

15 10 2021
Day Month Year

at this Registration Centre

1. Full Name: N2EOCHA MARTHA EJIUWAMEONY
(Surname first) (In block letters)

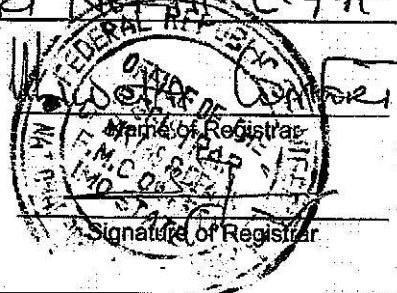
2. Sex: FEMALE

3. Date of Death: 18 09 2021
Day Month Year

4. Age of Death: 92 YEARS

5. Place of Death: AT HOME Town/Village OWERRI

6. Full Address of Usual Place of Residence of Deceased: A24 FAMILY
AMAKOTIA URATA OWERRI NORTH L.G.A.

Place of Issue: NEW OWERRIDate: 15 - 10 - 2021

Celebration of Life

Ex. 'B'

With gratitude to God for a life well spent, the family of High Chief Sir Paul A. Nzeocha of Azu family Umuakuru in Amakohia Uratta Autonomous Community in Owerri North L.G.A. Imo State announce the passing away of their wife, mother, mother-in-law and grandmother

High Lolo Lady
MARTHA
EJIUWAEMEONU
NZEOCHA
(NEE IJEBULA)
OJIUGO I OF URATTA ANCIENT KINGDOM

AGED
92
YEARS

BURIAL
ARRANGEMENT
FRIDAY 7TH JAN, 2022

8:00am - Body leaves Aladinma Mortuary to her husband's residence Amakohia Uratta

9:00am - Body lies in state @ her husband's compound

10:00am - Funeral Mass @ St. Michael's Parish Amakohia Uratta

1:00pm - Interment follows immediately after Mass @ her husband's compound

LEFT TO MOURN HER ARE:

High Chief Sir Paul A. Nzeocha (Aluko I of Uratta Ancient Kingdom) - Husband
Mrs. Jellima Nwagwu (Nee Nzeocha) - Daughter
Mr. Onwuka Chibozo Nzeocha (Houston, Texas USA) - Son

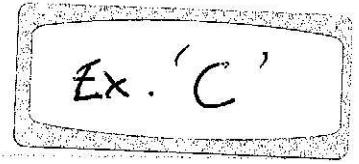
Adaora Nzeocha - Grand-daughter
Chloris Nzeocha - Grand-daughter
Divine Nzeocha - Grand-daughter
Mary Nwagwu - Grand-daughter
Ezinwa Nwagwu - Grand-daughter

Fw: Itinerary for GODWIN NZEOCHA - 12/20/21 - Lagos Nigeria (GTFIJG)

From: Nick Rajan (tnusa@att.net)

To: josephinenzeocha@yahoo.com

Date: Thursday, October 21, 2021, 10:51 AM CDT



Travel Network USA
3934 Cypress Creek Parkway, Suite 300C
Houston, Texas 77068
281-440-0665

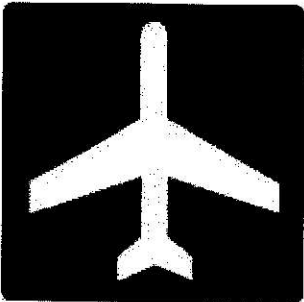
----- Forwarded Message -----

From: CTS Deliveries <support@ctsfares.com>

To: "tnusa@att.net" <tnusa@att.net>; "tnusa4@gmail.com" <tnusa4@gmail.com>

Sent: Thursday, October 21, 2021, 10:50:37 AM CDT

Subject: Itinerary for GODWIN NZEOCHA - 12/20/21 - Lagos Nigeria (GTFIJG)



Travel Network USA
3934 Cypress Creek Parkway, Suite
300C
Houston TX 77068 USA
Phone: (281) 440-0665

Thursday, 21OCT 2021 11:50 AM EDT

Passengers: GODWIN NZEOCHA

Agency Record Locator: GTFIJG

Lufthansa Confirmation 4NUGQ7

Please inspect your ticket details immediately. Travel Agency is not responsible for any errors 24 (twenty-four) hours after receipt.

AIR Monday, 20DEC 2021

Lufthansa

From: George Bush Intercontinental
Houston, TX

To: Frankfurt, Germany

Stops: Nonstop

Flight Number: 0441

Depart: 4:25 PM

Arrive: 9:20 AM 21DEC

Duration: 9 hour(s) 55 minute(s)



Class: Y- Coach/Economy

Status: CONFIRMED Miles: 5232 / 8371 KM
Equipment: Airbus A330 Jet MEAL: REFRSHMNT/COMP - MEALS
DEPARTS IAH TERMINAL D INTERNATIONAL - ARRIVES FRA TERMINAL 1
Lufthansa Confirmation number is 4NUGQ7
Check in on-line for [LUFTHANSA](#)
Click here to review Baggage guidelines for [LUFTHANSA](#)

AIR Tuesday, 21DEC 2021

Lufthansa Flight Number: 0568 Class: Y- Coach/Economy
From: Frankfurt, Germany **Depart:** 11:05 AM
To: Lagos, Nigeria **Arrive:** 5:40 PM
Stops: Nonstop Duration: 6 hour(s) 35 minute(s)
Status: CONFIRMED Miles: 3008 / 4813 KM
Equipment: Airbus A330 Jet MEAL: REFRSHMNT/COMP - MEALS
DEPARTS FRA TERMINAL 1 - ARRIVES LOS INTERNATIONAL TERMINAL
Lufthansa Confirmation number is 4NUGQ7
Check in on-line for [LUFTHANSA](#)
Click here to review Baggage guidelines for [LUFTHANSA](#)

AIR Thursday, 20JAN 2022

Lufthansa Flight Number: 0567 Class: L- Coach/Economy
From: Lagos, Nigeria **Depart:** 11:50 PM
To: Frankfurt, Germany **Arrive:** 6:20 AM 21JAN
Stops: Nonstop Duration: 6 hour(s) 30 minute(s)
Status: CONFIRMED Miles: 3008 / 4813 KM
Equipment: Airbus A330 Jet MEAL: REFRSHMNT/COMP - MEALS
DEPARTS LOS INTERNATIONAL TERMINAL - ARRIVES FRA TERMINAL 1
Lufthansa Confirmation number is 4NUGQ7
Check in on-line for [LUFTHANSA](#)
Click here to review Baggage guidelines for [LUFTHANSA](#)

AIR Friday, 21JAN 2022

Lufthansa Flight Number: 0440 Class: L- Coach/Economy
From: Frankfurt, Germany **Depart:** 10:00 AM
To: George Bush Intercontinental Houston, TX **Arrive:** 2:35 PM
Stops: Nonstop Duration: 11 hour(s) 35 minute(s)
Status: CONFIRMED Miles: 5232 / 8371 KM
Equipment: Airbus A330 Jet MEAL: REFRSHMNT/COMP - MEALS
DEPARTS FRA TERMINAL 1 - ARRIVES IAH TERMINAL D INTERNATIONAL
Lufthansa Confirmation number is 4NUGQ7
Check in on-line for [LUFTHANSA](#)
Click here to review Baggage guidelines for [LUFTHANSA](#)

Click here to review Baggage guidelines for:
[LUFTHANSA](#)

Ticket and fare are valid only as issued. These tickets are non-refundable and non-changeable. If allowed, fees will apply for any changes. All changes must be made prior to your scheduled departure. Airlines may change their penalty fees without notice. If you are unable to travel, you must call the travel agency or the airline prior to your scheduled departure and cancel your flights. Your ticket will have no refund/reissue value if you "NO-SHOW" for any of your flights.

Please reconfirm your flights with the airline 3 (three) days prior to each travel date.

Passengers are responsible for verifying that their Passport is valid 6 (six) months beyond the scheduled return date, as well as any Visa requirements for each destination.



ItineraryGTFUG_21OCT.pdf
94kB

CERTIFICATION OF SERVICE

I HEREBY CERTIFY THAT ON 3rd November, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic of electronic filing to the following:

Acting U.S. Attorney

And a copy by Facsimile at 713-718-3300, to the Acting U.S. Attorney, Jennifer Lowery

s/ Babatunde Coker

Attorney for Godwin Chiedo Nzeocha

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**ORDER ON GODWIN CHIEDO NZEOCHA'S MOTION TO ALLOW
TRAVEL OUTSIDE THE UNITED STATES**

On _____ this Court considered Godwin Chiedo Nzeocha's
Motion to allow travel outside the United States and the Motion is hereby

GRANTED _____

DENIED _____

Judge Andrew S. Hanen
United States District Court